

REMARKS/ARGUMENTS

Applicant would like to thank the Examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office Action and it is respectfully submitted that the application is patentable over the art of record.

Claim 6 stands rejected under 35 U.S.C. 102(b) as being anticipated by Kakenhi et al. (U.S. Patent No. 4,565,601). For at least the following reasons, the Examiner's rejection is respectfully traversed.

Kakehi does not disclose or teach "the top surface of the electrode has a top surface central area that is inside a boundary line that is distant inward by a prescribed length from an outer periphery of the substrate and in which the conductor is exposed and a ring-shaped top surface peripheral area that surrounds the top surface central area and in which the conductor is covered with an insulating coating" as recited in claim 6.

The Office Action states that on page 4:

Kakehi discloses that a top surface central area in which the electrode/conductor is exposed (the top surface central area of electrode 26' is exposed through a gap between the electrode and the cover 110 as seen in fig. 7) and a ring-shaped top surface peripheral in which the electrode/conductor is covered with an insulating covering (col. 8, lines 20-25).

The Kakehi gap referred to in the Office Action is not the central area of the upper plate electrode 26'. As clearly seen in Fig 7 of Kakehi, the *elevated stand 26"* is the central area of the upper plate electrode 26' and the referred to *gap is only a ring-shaped area* around the elevated stand 26". Since the referred to gap of Kakehi is only a ring-shape area of the upper plate electrode 26', the gap fails to teach a top surface central area of the electrode in which the

conductor is exposed. Thus, Kakehi does not disclose or teach all the elements of the claimed invention.

The Office Action refers to col. 8, lines 20–25 of Kakehi as disclosing a ring-shaped top surface peripheral area in which the conductor is covered with an insulating covering (Office Action 12/07/2005, page 4). Although the electrode cover 110' is a *cover*, Kakehi does not disclose or teach that the electrode cover 110' is a *coating*. Therefore, Kakehi does not disclose or teach a ring-shaped top surface peripheral area in which the conductor is covered with an insulating coating. Thus, Kakehi does not disclose or teach all the elements of the claimed invention.

The Office Action also refers to the Kakehi element 120 as a ring-shaped top surface peripheral area that surrounds the top surface central area (Office Action 12/07/2005, page 2). Although the tool 120 may be a *cover*, Kakehi does not disclose or teach that the tool 120 is a *coating*. Therefore, Kakehi does not disclose or teach a ring-shaped top surface peripheral area in which the conductor is covered with an insulating coating. Thus, Kakehi does not disclose or teach all the elements of the claimed invention.

Further with regards to claim 6, Kakehi does not disclose or teach “mounting the substrate on the top surface of the electrode in such a manner that a central portion and a peripheral portion of the insulating layer of the substrate are in contact with the top surface central area and the insulating coating in the top surface peripheral area, respectively” as recited in claim 6.

Kakehi discloses for Fig. 7:

The face of the elevated stand 26" has a size such that, when the center of the elevated stand 26" and that of the substrate 50 mounted thereon are roughly coincided, the peripheral edge of the substrate is allowed to protrude slightly from the elevated stand 26". (Col. 8, lines 18–22.)

As clearly seen in Fig. 7, the substrate is mounted on the top surface of the Kakehi electrode such that a central portion of the substrate is in contact with the elevated stand 26", but

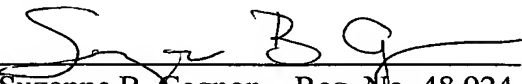
the peripheral portion of the substrate does not touch the electrode cover 110'. Therefore, Fig. 7 does not teach mounting the substrate on the top surface of the electrode in such a manner that the substrate peripheral portion is in contact with an insulating coating in a top surface peripheral area of the electrode.

Figures 1, 4-6 and 8 merely show that the entire surface of the substrate is mounted to the entire surface of the insulating substrate 60, which is embedded in the surface of the lower electrode. Therefore, Figs. 1, 4-6 and 8 do not teach mounting the substrate on the top of the electrode in such a manner that the substrate central portion is in contact with the exposed conductor in an electrode top surface central area and the substrate peripheral portion is in contact with the insulating coating in an electrode top surface peripheral area.

In light of the foregoing, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No. 35908.

Respectfully submitted,
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